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JS-6

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

<p>UNITED STATES OF AMERICA,</p> <p>Plaintiff,</p> <p>v.</p> <p>NATIONAL ATTORNEY COLLECTION SERVICES, INC., a California corporation; NATIONAL ATTORNEY SERVICES LLC, also d/b/a National Attorney Collection Services, also d/b/a N.A.C.S., a California limited liability company; and ARCHIE DONOVAN, individually and as an officer of National Attorney Collection Services, Inc.,</p> <p>Defendants.</p>	<p>CV 13-6212-ODW(VBKx)</p> <p>ORDER FOR PERMANENT INJUNCTION AND MONETARY JUDGMENT</p>
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Plaintiff, the United States of America, acting upon notification and authorization to the Attorney General by the Federal Trade Commission (“Commission” or “FTC”), filed its Complaint to obtain a permanent injunction, civil penalties, and other equitable relief in this matter, pursuant to Sections 13(b) and 16(a)(1) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§

53(b) and 56(a), and Section 814 of the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692*l*. Defendants National Attorney Collection Services, Inc. (“NACS”); National Attorney Services LLC, also d/b/a National Attorney Collection Services, also d/b/a N.A.C.S.; and Archie Donovan (“Donovan”) have waived service of the summons and Complaint. The parties, represented by the counsel identified below, have agreed to this settlement of this action, without adjudication of any issue of fact or law, to resolve all matters in dispute in this action between them by stipulation to this Stipulated Order for Permanent Injunction and Monetary Judgment (“Order”).

THEREFORE, it is hereby **ORDERED**, **ADJUDGED** and **DECREED** as follows:

FINDINGS

1. This Court has jurisdiction over this matter.
2. The Complaint states a claim upon which relief may be granted against Defendants under Sections 5(a), 5(m)(1)(A), 13(b), and 16(a) of the Federal Trade Commission Act, 15 U.S.C. §§ 45(a), 45(m)(1)(A), 53(b), and 56(a), and the FDCPA, 15 U.S.C. §§ 1692-1692p.
3. Venue in this district is proper under 28 U.S.C. §§ 1391(b)(1)-(3), (c)(1)-(2), and (d), 1395(a), and 15 U.S.C. § 53(b).
4. The activities of Defendants are in or affecting commerce, as “commerce” is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.
5. Defendants have entered into this Order freely and without coercion. Defendants further acknowledge that they have read the provisions of this Order and are prepared to abide by them.
6. Defendants neither admit nor deny any of the allegations in the Complaint, except as specifically stated in this Order and, only for purposes of this action, Defendants admit the facts necessary to establish jurisdiction.

7. All parties waive all rights to seek appellate review or otherwise challenge or contest the validity of this Order. Defendants further waive and release any claim they may have against the Commission and Plaintiff, and their employees, representatives, or agents.

8. Defendants agree that this Order does not entitle them to seek or obtain attorneys' fees as a prevailing party under the Equal Access to Justice Act, 28 U.S.C. § 2412, as amended by Pub. L. 104-121, 100 Stat. 847, 863-64 (1996), and further waive any right to attorneys' fees that may arise under said provision of law.

9. Entry of this Order is in the public interest.

DEFINITIONS

For purposes of this Order, the following definitions shall apply:

1. "Corporate Defendants" means National Attorney Collection Services, Inc.; National Attorney Services LLC, also d/b/a National Attorney Collection Services, also d/b/a N.A.C.S.; and their successors and assigns.

2. "Individual Defendant" means Archie Donovan.

3. "Defendants" means the Individual Defendant and the Corporate Defendants, individually, collectively, or in any combination.

4. "Plaintiff" means the United States of America.

5. "Commission" means the Federal Trade Commission.

6. "Debtor," for purposes of this Order, means any person obligated or allegedly obligated to pay any debt, as well as that person's spouse, parent (if the debtor is a minor), guardian, executor, or administrator.

7. "Clearly and prominently" shall mean:

A. In textual communications (*e.g.*, printed publications or words displayed on the screen of an electronic device), the required disclosures are of a type, size, and location sufficiently noticeable for an ordinary consumer to read

1 and comprehend them, in print that contrasts with the background on which they
2 appear;

3 B. In communications disseminated orally or through audible
4 means (*e.g.*, telephone calls or voicemails), the required disclosures are delivered
5 in a volume and cadence sufficient for an ordinary consumer to hear and
6 comprehend them.

7 C. In all instances, the required disclosures are presented in an
8 understandable language and syntax, and with nothing contrary to, inconsistent
9 with, or in mitigation of the disclosures used in any communication of them.

10 6. “Express consent” shall mean that prior to sending a text message to a
11 consumer’s mobile telephone: (i) the Defendants or their creditors shall have
12 clearly and prominently disclosed that the debtor may receive collection text
13 messages on mobile phone numbers provided to the original creditor or to
14 Defendants in connection with the transaction that is the subject of the text
15 message; and (ii) the individual has taken an additional affirmative step, including
16 a signature or electronic signature, that indicates their agreement to receive such
17 contacts.

18 **I. MONETARY JUDGMENT FOR CIVIL PENALTY**

19 **IT IS FURTHER ORDERED** that:

20 A. Judgment in the amount of One Million Dollars (\$1,000,000) is
21 entered in favor of Plaintiff and against Defendants NACS, NAS, and Archie
22 Donovan, jointly and severally, as a civil penalty.

23 B. Defendants shall make the payment required by this Section within
24 seven (7) days following entry of this Order. Such payment shall be made by
25 electronic fund transfer in accordance with procedures specified by a representative
26 of the Plaintiff.

27 C. In the event of any default in payment, which default continues for ten
28 (10) days beyond the due date of payment, the entire unpaid amount, together with

1 interest, as computed pursuant to 28 U.S.C. § 1961 from the date of default to the
2 date of payment, shall immediately become due and payable.

3 D. Defendants relinquish all dominion, control, and title to the funds paid
4 to the fullest extent permitted by law. Defendants shall make no claim to or
5 demand for return of the funds, directly or indirectly, through counsel or otherwise.

6 E. The facts as alleged in the Complaint filed in this action shall be taken
7 as true without further proof, only in any bankruptcy case or subsequent civil
8 litigation pursued by the Commission to enforce its rights to any payment or
9 money judgment pursuant to this Order.

10 F. Defendants further stipulate and agree that the judgment represents a
11 civil penalty owed to the government of the United States, is not compensation for
12 actual pecuniary loss, and, therefore, as to the Individual Defendant, it is not
13 subject to discharge under the Bankruptcy Code pursuant to Section 523(a)(7).

14 G. Defendants acknowledge that their taxpayer identifying numbers
15 and/or social security numbers, which Defendants previously submitted to the
16 Commission, may be used for collecting and reporting on any delinquent amount
17 arising out of this Order, in accordance with 31 U.S.C. § 7701.

18 **II. INJUNCTION AGAINST UNLAWFUL COLLECTION PRACTICES**

19 **IT IS FURTHER ORDERED** that Defendants and their officers, agents,
20 servants, employees, and attorneys, and all other persons in active concert or
21 participation with any of them who receive actual notice of this Order by personal
22 service or otherwise, whether acting directly or indirectly, in connection with
23 collecting or attempting to collect debts, are hereby permanently restrained and
24 enjoined from:

25 A. Using any false, deceptive, or misleading representation or means in
26 connection with the collection of any debt, including but not limited to:

- 27 1. Falsely representing or implying that Defendants are law firms, that
28 its collectors are attorneys, paralegals, legal assistants, or work closely

1 with legal professionals, or that communications from Defendants are
2 sent from or on behalf of attorneys;

3 2. Threatening to take any action that cannot legally be taken or that is
4 not intended to be taken;

5 3. Falsely representing or implying that nonpayment of a debt will result
6 in the arrest or imprisonment of a person or seizure, garnishment, or
7 attachment of a person's property or wages, when such action is not
8 lawful or when Defendants do not have the authority or intention of
9 taking such action; and

10 4. Failing to disclose in the initial communication with a consumer
11 (including in text messages) that Defendants are debt collectors
12 attempting to collect a debt and that any information obtained will be
13 used for that purpose, or failing to disclose in subsequent
14 communications (including in text messages) that the communication
15 is from a debt collector;

16 B. Using any unfair means to collect or attempt to collect any debt,
17 including, but not limited to:

18 1. Failing to provide consumers with an accurate corporate mailing
19 address upon request; and

20 2. On envelopes, using a business name indicating that Defendants are in
21 the debt collection business or using language or symbols, other than
22 the Defendant's address or business name;

23 C. Communicating, except when seeking to acquire location information
24 in compliance with Section 804 of the FDCPA, 15 U.S.C. § 1692b, with any
25 person other than the debtor, the debtor's attorney, a consumer reporting agency if
26 otherwise permitted by law, the creditor, the attorney of the creditor, or the
27 attorney of the debt collector, in connection with the collection of a debt, unless
28 Defendants have the prior consent of the debtor given directly to Defendants or the

1 express permission of a court of competent jurisdiction, or Defendants can show
2 that such communication is reasonably necessary to effectuate a postjudgment
3 judicial remedy;

4 D. Failing to provide consumers, either in an initial communication or a
5 written notice sent within five days after the initial communication, with
6 information about the debt and the right to dispute all or part of the debt, in
7 violation of Section 809(a) of the FDCPA, 15 U.S.C. § 1692g(a);

8 E. Violating any provision of the FDCPA, 15 U.S.C. § 1692-1692p (a
9 copy of which is attached hereto as Attachment A), including, but not limited to:
10 (1) Section 805(b), 15 U.S.C. § 1692c(b); (2) Section 807, 15 U.S.C. § 1692e; (3)
11 Section 808, 15 U.S.C. § 1692f; and (4) Section 809(a), 15 U.S.C. § 1692g(a).

12 **III. INJUNCTION REGARDING USE OF TEXT MESSAGES**

13 **IT IS FURTHER ORDERED** that Defendants and their officers, agents,
14 servants, employees, and attorneys, and all other persons in active concert or
15 participation with any of them who receive actual notice of this Order by personal
16 service or otherwise, whether acting directly or indirectly, in connection with
17 collecting or attempting to collect debts, are hereby permanently restrained and
18 enjoined from sending text messages to consumers' mobile phones unless the
19 consumer has provided prior express consent, as defined herein, to receive debt
20 collection text messages on mobile phones.

21 **IV. INJUNCTION AGAINST USE OF CERTAIN BUSINESS NAMES IN** 22 **COMMUNICATIONS WITH CONSUMERS**

23 **IT IS FURTHER ORDERED** that Defendants and their officers, agents,
24 servants, employees, and attorneys, and all other persons in active concert or
25 participation with any of them who receive actual notice of this Order by personal
26 service or otherwise, whether acting directly or indirectly, in connection with
27 collecting or attempting to collect debts, are hereby permanently restrained and
28 enjoined from:

1 A. Using, in communications with consumers, the business names
2 “National Attorney Service(s),” “National Attorney(s),” or “National Attorney
3 Collection Service(s)” and

4 B. Using, in communications with consumers, any business name
5 containing the words “Attorney(s),” “Legal,” “Law,” or any other word
6 representing or implying that Corporate Defendants are law firms or collect debts
7 on behalf of attorneys.

8 **V. NOTICE REQUIREMENTS**

9 **IT IS FURTHER ORDERED** that:

10 A. For a period of 5 years from the date of entry of this Order,
11 Defendants, whether acting directly or indirectly, shall make the following
12 disclosure clearly and conspicuously on each written collection communication,
13 excluding text messages to mobile phones, sent to a debtor for the purpose of
14 collecting a debt:

15 Federal and state law prohibits certain methods of debt collection
16 and requires that we treat you fairly. You can stop us from
17 contacting you by writing us a letter that tells us to stop the contact.
18 Sending such a letter does not make the debt go away if you owe it.
19 Once we receive your letter, we may not contact you again, except to
20 let you know that there will not be any more contact or that we
 intend to take a specific action.

21 If you have a complaint about the way we are collecting this debt,
22 please write to our CONTACT CENTER, [current physical address],
23 email us at [current email address], or call us toll-free at [current
24 phone number] between 9:00 A.M. Pacific Time and 5:00 P.M.
 Pacific Time Monday - Friday.

25 The Federal Trade Commission enforces the Fair Debt Collection
26 Practices Act (FDCPA). If you have a complaint about the way we
27 are collecting your debt, please contact the FTC online at
28 www.ftc.gov; by phone at 1-877-FTC-HELP; or by mail at 600
 Pennsylvania Ave., NW, Washington, DC 20580.

1 The above disclosure shall be given in in both English and Spanish, unless the
2 communication is written in any other language, in which case the disclosure shall
3 be given in that language and in English. The Spanish version that shall be given
4 is attached hereto as Attachment B.

5 B. Defendants, whether acting directly or indirectly, shall provide a
6 written (electronic or paper) copy of the following notice to all officers, servants,
7 agents, and employees having responsibility with respect to the collection of debts,
8 within thirty (30) days of the date of entry of this Order, and to each employee
9 hired for a period of five (5) years after that date, no later than the time the
10 employee assumes responsibility with respect to the collection of such debts, and
11 shall secure from each such person, within thirty (30) days of delivery, a signed
12 and dated statement acknowledging that he or she has read the notice:

13
14 Debt collectors must comply with the federal Fair Debt Collection
15 Practices Act, which limits our activities in trying to collect money
16 from consumers.

17 Section 804 of the Act says that, when contacting someone to
18 acquire location information about the debtor, you may not state that
19 the debtor owes a debt. You also may not contact this person more
20 than once unless the person asks you to or unless you reasonably
21 believe the person's earlier response was wrong or incomplete and
22 that the person now has correct or complete location information to
23 provide to you.

24 Section 805 of the Act says that, in connection with the collection of
25 a debt, you may not communicate with any person other than the
26 debtor for a purpose other than to obtain location information about
27 the debtor. This means that you may not reveal the existence of a
28 debt to anyone other than (1) the person who allegedly owes the debt
or (2) the debtor's spouse, parent (if the debtor is a minor), guardian,
executor, or administrator.

1 Section 807 of the Act prohibits the use of any false representation or
2 deceptive means to collect or attempt to collect any debt or to obtain
3 information about a debtor. Among other things, this includes: (1)
4 falsely representing or implying that any individual is an attorney or
5 that any communication is from an attorney; (2) representing or
6 implying that nonpayment of any debt will result in the arrest or
7 imprisonment of any person or the seizure, garnishment, attachment,
8 or sale of any property or wages of any person unless such action is
9 lawful and the debt collector or creditor intends to take such action;
10 (3) threatening to take any action that cannot legally be taken or that
11 is not intended to be taken; or (4) failing to disclose in an initial
12 written communication with the consumer and, in addition, if the
13 initial communication with the consumer is oral, in that initial oral
14 communication, that the debt collector is attempting to collect a debt
15 and that any information obtained will be used for that purpose, and
16 failing to disclose in subsequent communications that the
17 communication is from a debt collector, except with respect to a
18 formal pleading made in connection with a legal action.

14 Section 808 of the Act prohibits the use of any unfair or
15 unconscionable means to collect or attempt to collect any debt.
16 Among other things, this includes: (1) upon request, failing to
17 provide a valid mailing address for consumers to request validation
18 of the debt, dispute the debt, or to request that the collector cease
19 communications with the consumer, and (2) using any language or
20 symbol, other than the debt collector's address, on any envelope
21 when communicating with a consumer by use of the mails or by
22 telegram, except that a debt collector may use its business name if
23 such name does not indicate that it is in the debt collection business.

22 Section 809 of the Act requires that collectors must provide an initial
23 written notice containing certain information within five days after
24 the initial communication with a consumer in connection with the
25 collection of any debt, unless this information is contained in the
26 initial communication or the consumer has paid the debt. The
27 information that must be contained in the notice includes, among
28 other things, the amount of the debt, the name of the creditor to
whom the debt is owed, and information pertaining to the
consumer's right to dispute the debt.

1 **Both this company and individual debt collectors are liable for**
 2 **their violations of the Act, and they both may be required to pay**
 3 **penalties to the government if they violate it. In addition,**
 4 **individual debt collectors may face disciplinary action by this**
 company, including termination, for violations of the Act.

5 *Provided that*, for purposes of compliance with Part V.B of this Order, the
 6 signature required for the employee's statement that he or she has read the notice
 7 may be in the form of an electronic signature.

8 **VI. ORDER AND FDCPA ACKNOWLEDGMENTS**

9 **IT IS FURTHER ORDERED** that Defendants obtain acknowledgments of
 10 receipt of this Order and the FDCPA (attached hereto as Attachment A) and as it
 11 may hereafter be amended:

12 A. Each Defendant, within 7 days of entry of this Order, must submit to
 13 the Commission an acknowledgment of receipt of this Order sworn under penalty
 14 of perjury.

15 B. For 5 years after entry of this Order, each Individual Defendant for
 16 any business that such Defendant, individually or collectively with any other
 17 Defendant, is the majority owner or directly or indirectly controls, and each
 18 Corporate Defendant, must deliver a copy of this Order and the FDCPA to: (1) all
 19 principals, officers, directors, and managers; (2) all employees, agents, and
 20 representatives who participate in collecting or attempting to collect debts; and (3)
 21 any business entity resulting from any change in structure as set forth in the
 22 Section titled Compliance Reporting. Delivery must occur within 7 days of entry
 23 of this Order for current personnel. To all others, delivery must occur before they
 24 assume their debt collection responsibilities.

25 C. From each individual or entity to which a Defendant delivered a copy
 26 of this Order and the FDCPA, that Defendant must obtain, within 30 days, a signed
 27 and dated acknowledgment of receipt of this Order and the FDCPA.
 28

VII. COMPLIANCE REPORTING

IT IS FURTHER ORDERED that Defendants make timely submissions to the Commission:

A. One year after entry of this Order, each Defendant must submit a compliance report, sworn under penalty of perjury.

1. Each Defendant must: (a) designate at least one telephone number and an email, physical, and postal address as points of contact, which representatives of the Commission may use to communicate with Defendant; (b) identify all of that Defendant's businesses by all of their names, telephone numbers, and physical, postal, email, and Internet addresses; (c) describe the activities of each business, including the products and services offered, the means of advertising, marketing, and sales, and the involvement of any other Defendant (which Individual Defendants must describe if they know or should know due to their own involvement); (d) describe in detail whether and how that Defendant is in compliance with each Section of this Order; and (e) provide a copy of each Order Acknowledgment obtained pursuant to this Order, unless previously submitted to the Commission;
2. Additionally, each Individual Defendant must: (a) identify all telephone numbers and all email, Internet, physical, and postal addresses, including all residences; (b) identify all titles and roles in all business activities, including any business for which such Defendant performs services whether as an employee or otherwise and any entity in which such Defendant has any ownership interest; and (c) describe in detail such Defendant's involvement in each such business, including title, role, responsibilities, participation, authority, control, and any ownership.

1 B. For 15 years following entry of this Order, each Defendant must
2 submit a compliance notice, sworn under penalty of perjury, within 14 days of any
3 change in the following:

- 4 1. Each Defendant must report any change in: (a) any designated
5 point of contact or (b) the structure of any Corporate Defendant or
6 any entity that Defendant has any ownership interest in or directly
7 or indirectly controls that may affect compliance obligations
8 arising under this Order, including: creation, merger, sale, or
9 dissolution of the entity or any subsidiary, parent, or affiliate that
10 engages in any acts or practices subject to this Order.
- 11 2. Additionally, each Individual Defendant must report any change
12 in: (a) name, including aliases or fictitious name, or residence
13 address; or (b) title or role in any business activity, including any
14 business for which such Defendant performs services whether as
15 an employee or otherwise and any entity in which such Defendant
16 has any ownership interest, and identify its name, physical address,
17 and Internet address, if any.

18 C. Each Defendant must submit to the Commission notice of the filing of
19 any bankruptcy petition, insolvency proceeding, or any similar proceeding by or
20 against such Defendant within 14 days of its filing.

21 D. Any submission to the Commission required by this Order to be
22 sworn under penalty of perjury must be true and accurate and comply with 28
23 U.S.C. § 1746, such as by concluding: “I declare under penalty of perjury under
24 the laws of the United States of America that the foregoing is true and correct.
25 Executed on: _____” and supplying the date, signatory’s full name, title (if
26 applicable), and signature.

27 E. Unless otherwise directed by a Commission representative in writing,
28 all submissions to the Commission pursuant to this Order must be emailed to

DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to:
Associate Director for Enforcement, Bureau of Consumer Protection, Federal
Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580. The
subject line must begin: *FTC v. National Attorney Collection Services, Inc.*, No.
1223032.

VIII. RECORDKEEPING

IT IS FURTHER ORDERED that Defendants must create certain records
for 15 years after entry of the Order, and retain each such record for 5 years.
Specifically, Corporate Defendants, in connection with debt collection activities,
and each Individual Defendant for any business in which that Defendant,
individually or collectively with any other Defendants, is a majority owner or
directly or indirectly controls, must maintain the following records:

A. Accounting records showing the revenues from all goods or services
sold, all costs incurred in generating those revenues, and the resulting net profit or
loss;

B. Personnel records showing, for each person providing services,
whether as an employee or otherwise, that person's: name, addresses, and
telephone numbers; job title or position; dates of service; and, if applicable, the
reason for termination;

C. Consumer files containing the names, addresses, phone numbers,
dollar amounts of debt owed, records of collection activity, and amounts collected;

D. For every consumer complaint, whether received directly, indirectly,
or through a third party, records that include:

1. Any complaint and the date received, and the nature of the
complaint as reflected in any notes, logs, or memoranda,
including a description of the conduct alleged; and
2. The basis of the complaint, including the names of any debt
collectors or supervisors complained about; the nature of any

1 investigation conducted concerning the validity of any
2 complaint; all documents relating to the disposition of the
3 complaint, including records of all contacts with the consumer;
4 Defendants' response to the complaint and the response date;
5 whether the complaint was resolved; the date of resolution; and
6 any action taken to correct the conduct complained about.

7 E. Copies of all scripts and other training materials related to the
8 collection of debts;

9 F. Copies of all advertisements and other marketing materials;

10 G. Tape recordings of at least ninety (90) percent of all telephone calls
11 between Defendants and anyone they contact in collecting or attempting to collect
12 a debt, provided that Defendants must commence making such recordings no later
13 than one (1) year after the date of this Order and must maintain these recording for
14 90 days after they are made; and

15 H. All records and documents necessary to demonstrate full compliance
16 with each provision of this Order, including all submissions to the Commission.

17 **IX. COMPLIANCE MONITORING**

18 **IT IS FURTHER ORDERED** that, for the purpose of monitoring
19 Defendants' compliance with this Order:

20 A. Within 14 days of receipt of a written request from a representative of
21 the Commission, each Defendant must: submit additional compliance reports or
22 other requested information, which must be sworn under penalty of perjury; appear
23 for depositions; and produce documents, for inspection and copying. The
24 Commission is also authorized to obtain discovery, without further leave of court,
25 using any of the procedures prescribed by Federal Rules of Civil Procedure 29, 30
26 (including telephonic depositions), 31, 33, 34, 36, 45, and 69.

27 B. For matters concerning this Order, the Commission and Plaintiff are
28 authorized to communicate directly with each Defendant. Defendants must permit

1 representatives of the Commission to interview any employee or other person
2 affiliated with any Defendant who has agreed to such an interview. The person
3 interviewed may have counsel present.

4 C. The Commission may use all other lawful means, including posing,
5 through its representatives, as consumers, suppliers, or other individuals or entities,
6 to Defendants or any individual or entity affiliated with Defendants, without the
7 necessity of identification or prior notice. Nothing in this Order limits the
8 Commission's lawful use of compulsory process, pursuant to Sections 9 and 20 of
9 the FTC Act, 15 U.S.C. §§ 49, 57b-1.

10 **X. RETENTION OF JURISDICTION**

11 **IT IS FURTHER ORDERED** that this Court retains jurisdiction of this
12 matter for purposes of construction, modification, and enforcement of this Order.

13
14 **SO ORDERED this 25th day of October 2013.**

15
16 

17
18

UNITED STATES DISTRICT JUDGE

STIPULATED AND AGREED:

FOR PLAINTIFF:

THE UNITED STATES OF AMERICA

STUART F. DELERY

Assistant Attorney General, Civil Division

U.S. DEPARTMENT OF JUSTICE

STUART F. DELERY

Assistant Attorney General

MAAME EWUSI-MENSAH FRIMPONG

Deputy Assistant Attorney General

MICHAEL S. BLUME

Director, Consumer Protection Branch

RICHARD GOLDBERG

Assistant Director, Consumer Protection Branch

s/ Ann F. Entwistle

ANN F. ENTWISTLE

Trial Attorney

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**FOR THE FEDERAL TRADE
COMMISSION:**

s/ James Reilly Dolan
JAMES REILLY DOLAN
Acting Associate Director for Financial Practices

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Phone: 202-326-3565
Fax: 202-326-3629
runruh@ftc.gov

Date: _____

**FOR DEFENDANT NATIONAL ATTORNEY
COLLECTION SERVICES, INC.:**

By: s/ Archie Donovan
Archie Donovan for National Attorney Collection
Services, Inc.

Date: 7/10/13

**FOR DEFENDANT NATIONAL ATTORNEY
SERVICES LLC:**

By: s/ Archie Donovan
Archie Donovan for National Attorney Services
LLC

Date: 7/10/13

FOR DEFENDANT ARCHIE DONOVAN:

s/ Archie Donovan
ARCHIE DONOVAN

Date: 7/10/13

**COUNSEL FOR DEFENDANTS NATIONAL
ATTORNEY COLLECTION SERVICES,
INC.; NATIONAL ATTORNEY SERVICES
LLC; AND ARCHIE DONOVAN:**

s/ Barry J. Cutler
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Date: 7/11/2013